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CLERK OF DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2016 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

ANGEL DOMINGUEZ RAMIREZ, JR. (1),  
    aka "Emiliano,"  
    aka "Marcelo,"  
MARIO ALBERTO MARRUFO MATA (2),  
    aka "Alfil,"  
[REDACTED]  
JESUS BARRERA GOMEZ (4),  
    aka "Meridio,"  
[REDACTED]  
WONG HUNG NG (6),  
    aka "Mau,"  
GILBERTO GERARDO  
    VILLALOBOS ZAMORA (7),  
    aka "Lic,"  
CARLOS FLORES MARTINEZ (8),  
    aka "Felix,"  
[REDACTED]

Case No. 16CR1996-WQH

I N D I C T M E N T  
(4<sup>th</sup> Superseding)

Title 21, U.S.C., Secs. 959, 960  
and 963 - International  
Conspiracy to Distribute  
Controlled Substances; Title 21,  
U.S.C., Secs. 959, 960 -  
International Distribution of  
Controlled Substances; Title 18,  
U.S.C., Sec. 2 - Aiding and  
Abetting; Title 21, U.S.C.,  
Secs. 841(a)(1) and 846 -  
Conspiracy to Distribute  
Controlled Substances; Title 18,  
U.S.C., Secs. 1956(a)(1)(B)(i),  
(a)(2)(B)(i) and (h) -  
Conspiracy to Launder Monetary  
Instruments; Title 21, U.S.C.,  
Sec. 853 and Title 18, U.S.C.,  
Sec. 982 - Criminal Forfeiture

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[REDACTED]

[REDACTED]

MARCOS DE JESUS RODAS MARTINEZ (18),  
aka "James Bond,"  
GONZALO GARCIA COLORADO (19),  
aka "Borrado,"  
aka "El Borris,"

[REDACTED]

RAFAEL GONZALEZ ESTOLANO (21),  
aka "Rafa,"

[REDACTED]

CESAR YANEZ RUIZ (23),  
aka "Padrino,"

[REDACTED]

RAUL FLORES HERNANDEZ (26),  
aka "El Tio,"  
aka "Senior,"

[REDACTED]

MARICELA FLORES TORRUCO (28),  
aka "La Dama Hierro,"  
aka "Cascada,"

ALEJANDRO VARGAS LICONA (29),  
aka "Aguiles,"

JACOBO ISAAC RODRIGUEZ OBREGON (30),  
aka "Voltaren."

[REDACTED]

ORLANDO LOPEZ (32),  
aka "Aladino,"  
aka "Botas,"

[REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 STEPHEN NUNEZ (38),  
7 aka "Jhonnie Walker,"  
8 [REDACTED]  
9 [REDACTED]

10 ALEJOS CARDENAS CRUZ (41),  
11 aka "Lacho,"  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]

15 Defendants.  
16

17 The grand jury charges:

18 Count 1

19 Beginning at a date unknown to the grand jury and continuing up to  
20 and including May 2017, in the countries of Mexico, Costa Rica, Nicaragua  
21 and elsewhere, defendants ANGEL DOMINGUEZ RAMIREZ, JR., aka "Emiliano"  
22 and "Marcelo," MARIO ALBERTO MARRUFO MATA, aka "Alfil," [REDACTED]  
23 [REDACTED] JESUS BARRERA GOMEZ, aka "Meridio,"  
24 [REDACTED] WONG HUNG NG, aka "Mau," GILBERTO GERARDO  
25 VILLALOBOS ZAMORA, aka "Lic," CARLOS FLORES MARTINEZ, aka "Felix,"  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

[REDACTED]

[REDACTED] MARCOS DE JESUS RODAS

MARTINEZ, aka "James Bond," GONZALO GARCIA COLORADO, aka "BORRADO,"

aka "EL BORRIS," [REDACTED] RAFAEL GONZALEZ

ESTOLANO, aka "Rafa," [REDACTED] CESAR

YANEZ RUIZ, aka "Padrino," [REDACTED]

[REDACTED] RAUL FLORES HERNANDEZ, aka "El Tio,"

aka "Senior," [REDACTED] MARICELA

FLORES TORRUCO, aka "La Dama Hierro," aka "Cascada," ALEJANDRO VARGAS

LICONA, aka "Aguiles," JACOBO ISAAC RODRIGUEZ OBREGON, aka "Voltaren,"

[REDACTED] ORLANDO

LOPEZ, aka "Aladino," aka "Botas," [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] STEPHEN NUNEZ, aka "Jhonnie Walker," [REDACTED]

[REDACTED] ALEJOS CARDENAS CRUZ,

aka "Lacho," [REDACTED]

[REDACTED] who will first enter

the United States in the Southern District of California, did knowingly

and intentionally conspire with each other and with others known and

unknown to the grand jury to distribute and cause the distribution of a

controlled substance, to wit: 5 kilograms and more of a mixture and

substance containing a detectable amount of cocaine, a Schedule II

Controlled Substance; intending and knowing that such cocaine would be

unlawfully imported into the United States; all in violation of Title 21,

United States Code, Sections 959, 960, and 963.

Count 2

In or about January 2016, in the country of Mexico and elsewhere, defendants ANGEL DOMINGUEZ RAMIREZ, JR., aka "Emiliano" and "Marcelo," [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] JACOBO ISAAC RODRIGUEZ OBREGON, aka "Voltaren," [REDACTED]  
[REDACTED] who will first enter the United States in the Southern District of California, did knowingly and intentionally distribute and cause the distribution of 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, intending and knowing that such cocaine would be unlawfully imported into the United States; in violation of Title 21, United States Code, Sections 959 and 960, and Title 18, United States Code, Section 2.

Count 3

In or about March 2016, in the country of Mexico and elsewhere, defendants ANGEL DOMINGUEZ RAMIREZ, JR., aka "Emiliano" and "Marcelo," MARIO ALBERTO MARRUFO MATA, aka "Alfil," [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] who will first enter the United States in the Southern District of California, did knowingly and intentionally distribute and cause the distribution of 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, intending and knowing that such cocaine would be unlawfully imported into the United States; in violation

of Title 21, United States Code, Sections 959 and 960, and Title 18, United States Code, Section 2.

Count 4

In or about May 2016, in the country of Nicaragua and elsewhere, defendants JESUS BARRERA GOMEZ, aka "Meridio," [REDACTED] WONG HUNG NG, aka "Mau," and GILBERTO GERARDO VILLALOBOS ZAMORA, aka "Lic," who will first enter the United States in the Southern District of California, did knowingly and intentionally distribute and cause the distribution of 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, intending and knowing that such cocaine would be unlawfully imported into the United States; in violation of Title 21, United States Code, Sections 959 and 960, and Title 18, United States Code, Section 2.

Count 5

Beginning at a date unknown to the grand jury and continuing up to and including May 2017, within the Southern District of California and elsewhere, defendants ANGEL DOMINGUEZ RAMIREZ, JR., aka "Emiliano" and "Marcelo," MARIO ALBERTO MARRUFO MATA, aka "Alfil," [REDACTED]

[REDACTED] JESUS BARRERA GOMEZ, aka "Meridio," [REDACTED] WONG HUNG NG, aka "Mau," GILBERTO GERARDO VILLALOBOS ZAMORA, aka "Lic," CARLOS FLORES MARTINEZ, aka "Felix," [REDACTED]

[REDACTED] MARCOS DE JESUS RODAS MARTINEZ, aka "James Bond," GONZALO GARCIA COLORADO, aka "BORRADO,"



1 aka "EL BORRIS," [REDACTED] RAFAEL GONZALEZ  
 2 ESTOLANO, aka "Rafa," [REDACTED] CESAR  
 3 YANEZ RUIZ, aka "Padrino," [REDACTED]  
 4 [REDACTED] RAUL FLORES HERNANDEZ, aka "El Tio,"  
 5 aka "Senior," [REDACTED] MARICELA  
 6 FLORES TORRUCO, aka "La Dama Hierro," aka "Cascada," ALEJANDRO VARGAS  
 7 LICONA, aka "Aguiles," JACOBO ISAAC RODRIGUEZ OBREGON, aka "Voltaren,"  
 8 [REDACTED] ORLANDO  
 9 LOPEZ, aka "Aladino," aka "Botas," [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED] STEPHEN NUNEZ, aka "Jhonnie Walker," [REDACTED]  
 14 [REDACTED] ALEJOS CARDENAS  
 15 CRUZ, aka "Lacho," [REDACTED]  
 16 [REDACTED] did

17 knowingly and intentionally conspire together and with each other and  
 18 with others known and unknown to the grand jury to possess with intent  
 19 to distribute and to distribute a controlled substance, to wit:  
 20 5 kilograms and more of a mixture and substance containing a detectable  
 21 amount of cocaine, a Schedule II Controlled Substance; all in violation  
 22 of Title 21 United States Code, Sections 841(a)(1) and 846.

23 Count 6

24 Beginning at a date unknown to the grand jury and continuing up to  
 25 and including May 2017, within the Southern District of California and  
 26 elsewhere, defendants ANGEL DOMINGUEZ RAMIREZ, JR., aka "Emiliano" and  
 27 "Marcelo," MARIO ALBERTO MARRUFO MATA, aka "Alfil," [REDACTED]  
 28 [REDACTED] JESUS BARRERA GOMEZ, aka "Meridio,"

1 [REDACTED] WONG HUNG NG, aka "Mau," GILBERTO GERARDO  
2 VILLALOBOS ZAMORA, aka "Lic," CARLOS FLORES MARTINEZ, aka "Felix,"  
3 [REDACTED]  
4 [REDACTED]

5 [REDACTED] MARCOS DE JESUS RODAS MARTINEZ, aka "James  
6 Bond," [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED] ALEJANDRO  
8 VARGAS LICONA, aka "Aguiles," JACOBO ISAAC RODRIGUEZ OBREGON,  
9 aka "Voltaren," [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]

13 [REDACTED] STEPHEN  
14 NUNEZ, aka "Jhonnie Walker," [REDACTED]  
15 ALEJOS CARDENAS CRUZ, aka "Lacho," [REDACTED]

16 [REDACTED] did knowingly combine, conspire, and agree with each other  
17 and with other persons known and unknown to the grand jury to commit  
18 offenses against the United States, to wit: to knowingly conduct  
19 financial transactions affecting interstate commerce and foreign  
20 commerce, which transactions involved the proceeds of specified unlawful  
21 activity, that is, Conspiracy to Possess With Intent to Distribute and  
22 to Distribute Controlled Substances in violation of Title 21, United  
23 States Code, Sections 841(a)(1) and 846, knowing that the transactions  
24 were designed in whole and in part to conceal and disguise the nature,  
25 location, source, ownership, and control of the proceeds of specified  
26 unlawful activity, and knowing that the property involved in the  
27 financial transactions represented the proceeds of some form of unlawful  
28 activity, in violation of Title 18, United States Code,



1 Section 1956(a)(1)(B)(i); and to transport, transmit, and transfer, a  
 2 monetary instrument and funds involving the proceeds of specified  
 3 unlawful activity, that is, Conspiracy to Possess With Intent to  
 4 Distribute and to Distribute Controlled Substances in violation of  
 5 Title 21, United States Code, Sections 841(a)(1) and 846, from a place  
 6 in the United States to and through a place outside the United States,  
 7 knowing that the funds involved in the transportation, transmission, and  
 8 transfer represented the proceeds of some form of unlawful activity and  
 9 knowing that such transportation, transmission, and transfer was  
 10 designed in whole and in part to conceal and disguise the nature,  
 11 location, source, ownership, and control of the proceeds of specified  
 12 unlawful activity, in violation of Title 18, United States Code,  
 13 Section 1956(a)(2)(B)(i); all in violation of Title 18, United States  
 14 Code, Section 1956(h).

#### 15 Criminal Forfeiture Allegations

16 1. The allegations contained in Counts 1 through 6 are realleged  
 17 and by their reference fully incorporated herein for the purpose of  
 18 alleging forfeiture to the United States of America pursuant to the  
 19 provisions of Title 21, United States Code, Section 853 and Title 18,  
 20 United States Code, Section 982.

21 2. As a result of the commission of the felony offenses alleged  
 22 in Counts 1 through 5 of this indictment, said violations being  
 23 punishable by imprisonment for more than one year and pursuant to  
 24 Title 21, United States Code, Sections 853(a)(1) and 853(a)(2),  
 25 defendants ANGEL DOMINGUEZ RAMIREZ, JR., aka "Emiliano" and "Marcelo,"  
 26 MARIO ALBERTO MARRUFO MATA, aka "Alfil," [REDACTED]  
 27 [REDACTED] JESUS BARRERA GOMEZ, aka "Meridio," [REDACTED]  
 28 [REDACTED] WONG HUNG NG, aka "Mau," GILBERTO GERARDO

1 VILLALOBOS ZAMORA, aka "Lic," CARLOS FLORES MARTINEZ, aka "Felix,"  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED] [REDACTED] [REDACTED]  
7 [REDACTED] MARCOS DE JESUS RODAS  
8 MARTINEZ, aka "James Bond," GONZALO GARCIA COLORADO, aka "BORRADO,"  
9 aka "EL BORRIS," [REDACTED] RAFAEL GONZALEZ  
10 ESTOLANO, aka "Rafa," [REDACTED] CESAR  
11 YANEZ RUIZ, aka "Padrino," [REDACTED]  
12 [REDACTED] RAUL FLORES HERNANDEZ, aka "El Tio,"  
13 aka "Senior," [REDACTED] MARICELA  
14 FLORES TORRUCO, aka "La Dama Hierro," aka "Cascada," ALEJANDRO VARGAS  
15 LICONA, aka "Aguiles," JACOBO ISAAC RODRIGUEZ OBREGON, aka "Voltaren,"  
16 [REDACTED] [REDACTED] ORLANDO  
17 LOPEZ, aka "Aladino," aka "Botas," [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED] STEPHEN NUNEZ, aka "Jhonnie Walker," [REDACTED]  
22 [REDACTED] ALEJOS CARDENAS  
23 CRUZ, aka "Lacho," [REDACTED]  
24 [REDACTED] shall,  
25 upon conviction, forfeit to the United States all their rights, title  
26 and interest in any and all property constituting, or derived from, any  
27 proceeds the Defendants obtained, directly or indirectly, as the result  
28 of the offenses, and any and all property used or intended to be used

1 in any manner or part to commit and to facilitate the commission of the  
2 violations alleged in this indictment.

3 3. Upon conviction of the offense set forth in Count 6, defendants  
4 ANGEL DOMINGUEZ RAMIREZ, JR., aka "Emiliano" and "Marcelo," MARIO  
5 ALBERTO MARRUFO MATA, aka "Alfil," [REDACTED]

6 [REDACTED] JESUS BARRERA GOMEZ, aka "Meridio," [REDACTED]

7 [REDACTED] WONG HUNG NG, aka "Mau," GILBERTO GERARDO VILLALOBOS ZAMORA,  
8 aka "Lic," CARLOS FLORES MARTINEZ, aka "Felix," [REDACTED]

9 [REDACTED]  
10 [REDACTED]  
11 MARCOS DE JESUS RODAS MARTINEZ, aka "James Bond," [REDACTED]

12 [REDACTED]  
13 [REDACTED] ALEJANDRO VARGAS LICONA,  
14 aka "Aquiles," JACOBO ISAAC RODRIGUEZ OBREGON, aka "Voltaren," [REDACTED]

15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED] STEPHEN NUNEZ, aka "Jhonnie Walker," [REDACTED]

20 [REDACTED] ALEJOS CARDENAS CRUZ, aka "Lacho," [REDACTED]

21 [REDACTED] shall forfeit to the  
22 United States, all property, real and personal, involved in such offense,  
23 and all property traceable to such property.

24 4. If any of the above referenced forfeitable property, as a  
25 result of any act or omission of the defendants:

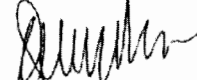
26 a. cannot be located upon the exercise of due diligence;

27 b. has been transferred or sold to, or deposited with, a third  
28 party;

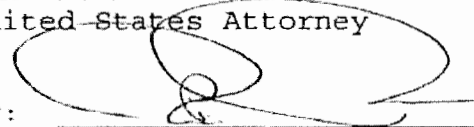
1 c. has been placed beyond the jurisdiction of the Court;  
2 d. has been substantially diminished in value; or  
3 e. has been commingled with other property which cannot be  
4 subdivided without difficulty;  
5 it is the intent of the United States, pursuant to Title 21, United  
6 States Code, Section 853(p), to seek forfeiture of any other property  
7 of the defendants up to the value of the said property listed above as  
8 being subject to forfeiture.  
9 All in violation of Title 21, United States Code, Section 853 and  
10 Title 18, United States Code, Section 982.

11 DATED: January 4, 2018.

12 A TRUE BILL:

13   
14 Foreperson

15 ADAM L. BRAVERMAN  
16 United States Attorney

17 By:   
18 JOSHUA P. JONES  
Assistant U.S. Attorney

19 I hereby attest and certify on 1/4/18  
20 That the foregoing document is a full, true and correct  
21 copy of the original on file in my office and in my legal  
custody.

22 CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

23 By  Deputy  
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26  
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24 [REDACTED]

25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28 [REDACTED]